



Environmental Protection Agency

117 W. Main Street Collinsville, IL. 62234

618/345-4606

CERTIFIED
#128314

Refer to: LPC 11780201 - Macoupin County - Brighton/Brighton #1
LPC 11780203 - Macoupin County - Brighton/Brighton #2
ILD000667139
Compliance Inquiry Letter

April 16, 1984

Mr. Gene Evans
Brighton Landfill
Box 607
Brighton, Illinois 62017



Dear Mr. Evans:

Your facility was inspected on March 22, 1984 by P. C. Mann, M. Dilday and P. H. McCarthy, on April 4, 1984 by D. Retzlaff, R. Finley, J. Wojcik and P. H. McCarthy, and again on April 5, 1984 by M. Dilday and P.C. Mann. During those inspections, apparent violations of the Illinois Environmental Protection Act and Rules and Regulations set forth by the Illinois Pollution Control Board were revealed. The purpose of this letter is to inquire as to your position with respect to the validity of the Agency's findings and also your plans to correct the apparent violations. Enclosed with this letter is a copy of the March 22, 1984 inspection report. The apparent violations are as follows:

Section 722.111 - Failure to determine if the solid waste generated by the facility is hazardous according to the prescribed methods listed in this section.

Section 725.113(a)(3) - Failure to repeat waste analysis as necessary.

Section 725.113(a)(4) - Failure to analyze each movement of waste when necessary to determine if it matches the accompanying manifest.

Section 725.113(b) - Failure to develop and follow a written waste analysis plan.

Section 725.113(c) - Failure to specify the procedures to be followed to inspect and if necessary to analyze each movement of hazardous waste received at the facility.

Section 725.114(b)(2) - Failure to provide an artificial or natural barrier which completely surrounds the "active portion" of the site.

Section 725.114(c) - Failure to post appropriate warning signs at each entrance to the active portion and other locations.

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Section 725.115(a) - Failure to inspect the facility often enough to identify problems in time to correct them.

Section 725.115(b)(1-3) - Failure to develop and follow a written inspection schedule and failure to keep said schedule at the facility.

Section 725.116(a-e) - Failure to comply with Personnel Training requirements.

Section 725.137(a) - Failure to document any attempts to enter into arrangements with local authorities.

Section 725.137(b) - Failure to document denials by local authorities to enter into an agreement with the facility.

Section 725.152(a) - Failure to include in the on-site contingency plan the actions facility personnel must take in the event of an incident.

Section 725.152(c) - Failure to include in the contingency plan a description of any arrangements made with local police departments, fire departments, etc. (with the exception of Alton Memorial Hospital).

Section 725.152(d) - Failure to include in the contingency plan the name and address of the current facility emergency coordinator.

Section 725.153(b) - Failure to submit a copy of the contingency plan to all local emergency type facilities that may provide services.

Section 725.155 - Failure to train the current emergency coordinator.

Section 725.173 - Failure to maintain an operating record at the facility in which the required information is documented.

Section 725.211 - Failure to contain in the on-site closure plan a demonstration of how site will be closed to comply with this section.

Section 725.212(a) - Failure to include in the on-site closure plan, when the facility will comply with the specific requirements under 725.212(a)(1 thru 4).

Section 725.242 - Failure to demonstrate that closure costs were determined based on the operations which would make closure the most expensive.

Section 725.402(a) - Failure to design, construct, operate and maintain a run-on control system to comply with this section.

Section 725.402(b) - Failure to design, construct, operate and maintain a run-off control system to comply with this section.

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Section 725.409(a) - Failure to maintain on a map the location of each cell with respect to permanently surveyed benchmarks.

Section 725.409(b) - Failure to maintain on a map the contents of each cell and approximate location of each hazardous type within each cell.

Section 725.410(a)(b)(c) - Failure to maintain on-site, a closure plan which addresses the specific items of this section.

Violations of the Environmental Protection Act:

Section 12

Section 21(a) and (f)

Chapter 7 Violations:

Rule 302 - Exceeding permitted height

Rule 303(b) - Inadequate spreading and compacting

Rule 305(a) - Daily cover not being applied

Rule 305(b) - Inadequate intermediate cover

Rule 306 - Uncollected litter on-site

Rule 313 - Threaten or allow discharge of contaminants

Rule 314(b) - Inadequate on-site roads

Rule 314(e) - Failure to control leachate

Rule 314(h) - Failure to conceal operations from public view

Please submit in writing, within 10 calendar days of the date of this letter, the reasons for the apparent violations outlined above, as well as a description of the steps you have instituted to prevent any further recurrence of the above cited violations. The written response should be sent to the following address:

Kenneth G. Mensing
Illinois Environmental Protection Agency
Division of Land Pollution Control
117 West Main Street
Collinsville, Illinois 62234

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Brighton/Brighton 1 & 2

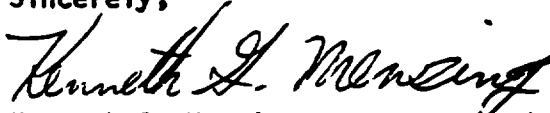
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Further, take notice that non-compliance with the Illinois Environmental Protection Act and the Rules and Regulations adopted thereunder may be the subject of an enforcement action pursuant to Title VIII of the Illinois Environmental Protection Act, Ch. 111 1/2, Ill. Rev. Stat., Sec. 1001 et seq.

If you have any questions regarding the above, please contact me at 618/345-4606.

Sincerely,



Kenneth G. Mensing, Southern Regional Manager
Field Operations Section
Division of Land Pollution Control

PMH:jlr

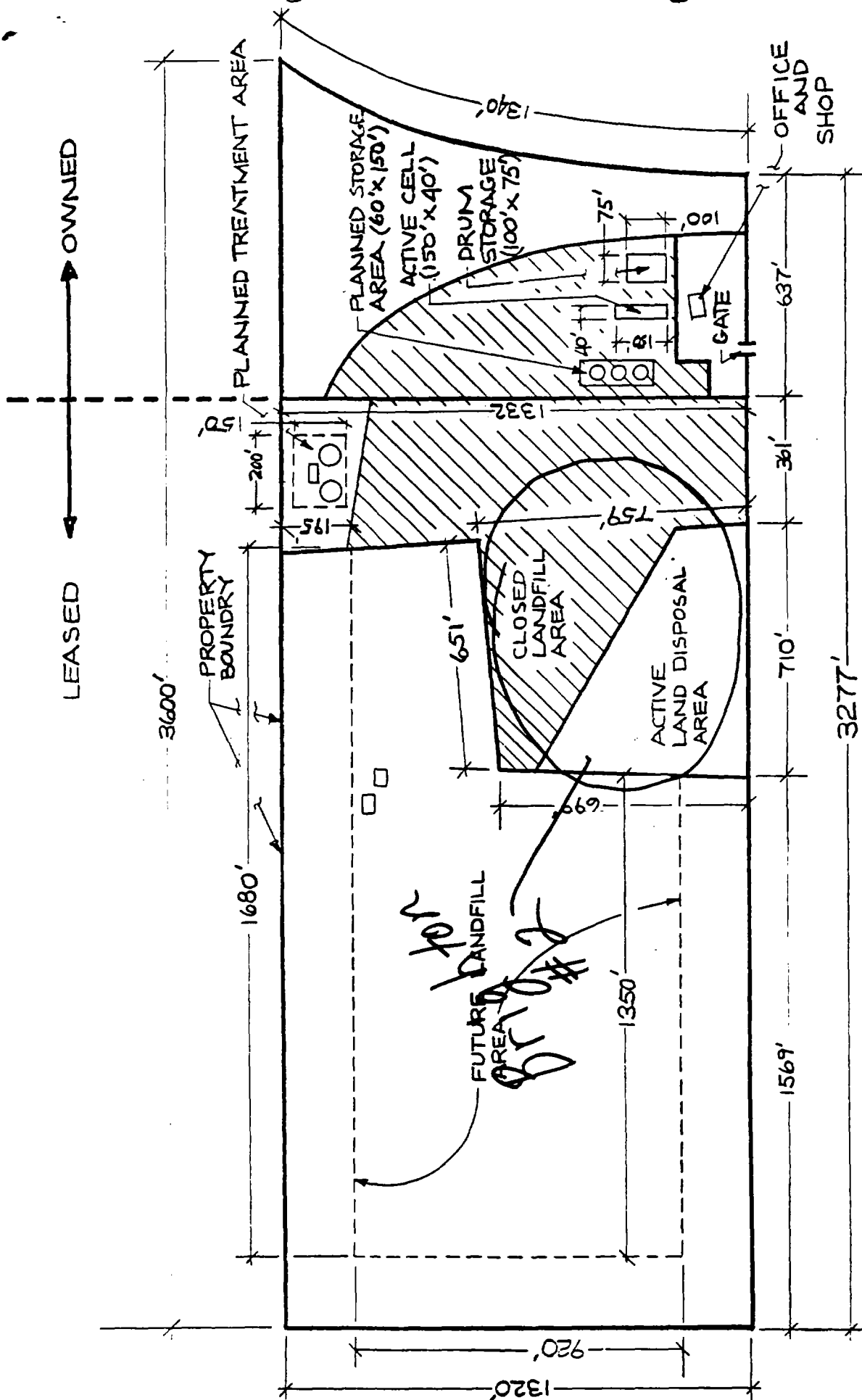
cc: Division File ✓
Southern Region
Bill Seltzer

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V. FACILITY DRAWING (see page 4)



BRIGHTON LANDFILL

SCALE - 1" = 400'